

V-XI

Please answer each question completely and accurately. Incomplete answers may hinder the processing of your charge. If additional space is needed use the supplemental answer sheet. When all questions are answered, please sign and date the form and return it to this office or bring it with you if you are scheduled for an intake interview.

1. (a) Who harassed you? Provide the name, position or any other identification of each person who harassed you.

S. Gareth Graham Supervisor Juvenile Probation, Cumberland Co.  
Joseph Osenkarski Chief " " "  
Judge Harold Shelly

- (b) Tell us which of these people (if any) had the authority to discipline you, evaluate your performance or control your work assignments.

S. Gareth Graham  
Joseph Osenkarski  
Judge Harold Shelly

2. Who else was harassed? Provide their names, position or other identification of anyone you know who has been similarly harassed.

Debra Green Juvenile PO  
Kerry Houser Adult PO.

3. If you were not directly harassed but affected by the offensive conduct of a harasser toward another person, provide the name, position or other identification of the person harassed and the harasser.

Kerry Houser - harassed by Joseph Osenkarski & S. Gareth Graham

4. What did the harasser do or say? Provide a detailed, specific, description of the harassment. Do not use general or vague terms to describe the offensive conduct or comments.

In 1993 Mr Osenkarski (& Mr Graham) identified the women in the Probation office as the "Cunt Club". When I became employed in 1995 I was told in detail by both men about this and how wrongly there had been accusations. I was told not to talk to her and was told they "punished" everybody involved who testified on her behalf.

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5. When did the harassment occur, and is it continuing? Give dates, approximate dates, day, time of day for each incident of harassment.

11/20/96 - Mr Graham at the late fir 11/16/96 - office PM, 2/4/97 - office - DayTime,  
 4/2/97 - Mr G office noon, 12/12/96 - Mr G car parking, 4/4/97 - office AM, 1/15/96 - Mr G  
 car noon, 3/95 - DayTime, Between 9/27-5/2/96 evening, 7/7/97 AM, 10/2/96 DayTime  
 7/11/97 - 11:00 AM Judge's chambers

6. Where did the harassment occur?

At the office, in Mr Graham's car while transporting juveniles,  
 At my home, over the phone.

7. Were there any witnesses? If so, provide the names, position, telephone number and address of witnesses and what they can attest to.

Debra Green 717-240-6270 PO

Kerry Houser " " 6283 "

Ronna Boyles " " 7824 "

Bill Brandt " " 6266 "

Mark Galbraith " " 6262 "

Greg Miller " " 6278

8. Did you tell the harasser or otherwise indicate that the conduct was unwelcome and it must stop? If not, why not? If you did, how did the harasser respond?

I did tell Mr Graham the harassment escalated, I was  
 threatened with disciplinary action and told no one tells him  
 what to do, he has control over the child and the Judge.

9. Does the employer have a sexual harassment policy that you are aware of? Is there a provision for reporting sexual harassment? If so, did you use that procedure?

Yes, Yes, Yes

10. Did you complain about the harassment to management, human resource department or file an internal grievance or report it to any employer representative? Provide the date(s) you complained as well as the name and position of any employer representative you complained to about the harassment.

Mr. Osenkowski (Chief) 4/2/97

Dan Hartnett (Personnel Director) 4/3/97

Human Resources 5/12/97

11. Describe the employer representative's response to any complaint about harassment that you lodged. If you received a written response, attach a copy. (never received)

Was informed recommendation was to install for Mr Graham, suspended  
Mr Osenkowski, Judge, then said he would transfer, demote, reassign Mr Graham. Judge  
then reversed entire recommendation. Telling me Mr Graham after hearing of recommenda  
confessed (falsely) to having an affair with me (after 4 months of investigation)

12. Who else did you tell about the harassment other than the above?

My counselor, my coworkers who witnessed a great majority of the incidents  
My attorney, my family

13. What was their response?

Shocked that nothing was being done to alleviate the  
problem. During all but a few weeks of the 4 months investigation,  
I was still supervised by Mr Graham in a very hostile  
environment

14. If you did not report the harassment to management or use an internal grievance procedure, explain in detail your reasons for not doing so.

15. Were you subjected to any unfavorable treatment, change in position, duties, etc., as a result of your complaining to the harasser and or to management about the harassment? If so, describe the treatment you received and who caused it.

Mr Graham intensified his yelling at me. Threatening corrective  
actions. Mr Graham argued over everything I did. The Sr PO's  
in the Juvenile Dept. have ignored me (all but 2) I am ignored  
by both offenders, glad at, not kept informed of office  
activities

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16. Did the harassment . . . our ability to perform your job? describe the effect it had on job performance.

While the harassment was at its worst I could not concentrate  
I made mistakes I never made before, I was afraid to submit any cases  
for approval for fear of rage from Mr Graham. I had difficulty in  
determining a juvenile because of my nervousness which is very unsafe

17. What effect did the harassment have on you personally?

My emotional well being has greatly been affected, my husband is furious  
over the lies and lack of response. I was unable to concentrate during master classes

\* I have been afraid at home if I am alone because of retaliation. I have ongoing stomach  
intestinal problems. My relationship with coworkers (friends of Mr G) has deteriorated. I have  
emotional stress over my coworkers who willingly came forward. See below

18. Describe any monetary or other losses you suffered as a result of the harassment.

Legal fees, some medication costs. I have had to use some sick time  
because of emotional related stomach problems

19. What do you want to accomplish by filing a charge of sexual harassment?

I want to prevent these men from ever supervising females  
again. I want the harassment to stop forever not just temporarily.

I want the County to be aware that this is a very serious problem and  
that our department (officers of the Court) is almost immune to county  
regulations. At least this is the attitude held by the management and  
reflected by the judges overriding decisions. I want to be treated as equal  
in this mostly male office. I have to feel safe as a partner when I need  
to detain a juvenile who has committed a crime.

Barbara E. Vanden

Signature

7/21/97

Date

17 I still have great difficulty eating anything when I am in the  
 office especially when Mr Graham or Mr Osenkarski is present and  
 They give me angry stares.

## WITNESS QUESTIONNAIRE

Identify all witnesses who you believe have information which would support your allegations. For each witness identified, provide his/her name, address (if known), phone number (if known) or other means to contact the witness. In addition, indicate what type(s) of information you believe the witness can provide:

Debra Green PO. (717-240-6270) witnessed experienced harassment discern

Kerry Houser PO. (717-240-6283) " " ment

Mark Galbraith PO. (717-240-6262) witnessed harassment / Knows punishment attitude

Greg Miller PO. (717-240-6278) " " "

Bill Brandt PO. (717-240-6266) " experienced harassment, punishment "

Sam Miller PO. (717-240-6279) heard Mr. G. remarks (reluctant, "

Ronna Boyles secretary (717-240-7824) " " "

Jen Crum secretary (717-240-6265) " " "

Betsy Baker (717-240-6257) history of past problems harassment

Darby Christlieb (717-240-6273) witnessed harassment & punishment

Nicolas Barrelet (717-240-6271) " " " "

NAME: \_\_\_\_\_

**REMEDY INFORMATION**

1. If your charge alleges failure to hire or failure to promote, what was the salary or salary range of the job you applied for? \$ \_\_\_\_\_. What was the salary of the position you held at the time you applied for the position in question? \$ \_\_\_\_\_.
2. If your charge alleges discharge or suspension without pay, what was the salary of the position you held at the time of discharge or suspension? \$ \_\_\_\_\_.
3. If your charge alleges demotion, what was the salary of the position you held before you were demoted? \$ \_\_\_\_\_. After you were demoted? \$ \_\_\_\_\_.
5. Other than loss of salary, what money have you lost as a result of the alleged discrimination (e.g., cost of looking for new job, cost of health insurance you had to buy, etc.)? Describe each type of loss and provide an approximate dollar value for each type of loss. (NOTE: You should save receipts or other proof of all such expenses.)

Attorney bills - continue to accumulate since April 1997  
Medication

6. Other than monetary losses, what losses have you incurred as a result of the alleged discrimination (e.g., loss of seniority, no longer being part of a pension plan, loss of company car, had to seek psychiatric services)?

I have experienced ongoing stomach, intestinal and  
nervous problems since this situation began. As  
the incidents increased in intensity and occurrence  
I have had many sleepless nights. I have gone  
for counseling through a psychologist  
loss of self esteem at times and confidence when

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I was being screamed at, belittled in public, threatened,  
and accused of false activities by the Judge.  
I am afraid to be alone at my home for fear of retaliation and  
because Mr Graham knows my home location which is isolated

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## REMEDY INFORMATION (p. 2)

7. What relief or remedy are you seeking in response to filing a charge with EEOC?

I want to see Mr Graham and Mr Orenkarski  
terminated from their positions. I am still and  
have been under the supervision of both men. A FO  
has been assigned as a go between to give me assignments  
from Mr Graham. However all decisions are still at their  
discretion.

8. If your charge alleges discharge or failure to hire, have you obtained other employment since the date of the alleged discrimination? If yes, please indicate the date of employment and the salary you earn with this new employer. (If there has been more than one employer, please indicate all dates of employment and salary with each employer since your date of discharge or the date you were denied hire by the employer named in your charge.)

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I declare under penalty of perjury that I have read the above statements and that they are true and correct.

Barbara E. Vanner

Signature

7/21/97

Date

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## HARASSMENT QUESTIONNAIRE

Provide specific examples of all alleged verbal and/or physical harassment. Be as exact as you can be in describing each act of harassment (e.g., the exact words that were said and/or the exact nature of any physical harassment). If more space is needed for any response, please use additional pages.

1. For each act of alleged harassment, indicate the following:

a) Detailed description of the harassment, including dates:

Mr. Graham has stated to me that he has no plan to hire anymore middle aged  
people or women (I am a 48 year old female). He has stated that all divorced women  
are angry at men (I am a divorced - remarried woman).  
Mr. Graham has stated to me that my seniority and promotion possibilities  
are not based on seniority alone - There are other things to be considered  
which at me interpreted by me to mean sexual innuendos. Several times  
Mr. Graham has stated that I need to satisfy the Community, the victim and...  
hesitating smiling suggestively in my direction, leaving an unanswered question  
when he discussed the three areas of the Juvenile Probation balanced approach.

b) Name and title of person(s) doing the harassment and the working relationship of <sup>captured me</sup> each person to you (e.g., immediate supervisor, co-worker):

S. Gareth Graham Supervisor - previously (before Sept.  
1996) Mr. Graham was a probation officer II in charge of  
Training and mentoring to me as a new employee.  
Joseph Ozenkarski Chief Juvenile Probation Officer.

Use this form to continue the answer or response to any of the 1 items. Indicate the item number.

Mr. Graham has harassed me regarding a female juvenile in my precinct. The girl had suicidal problems related to AIDS when I noted this medical condition in his social history. Mr. Graham responded "Jesus Christ, do I need to get a Peter <sup>11/20/96</sup> Pater in my office." Mr. Graham said this statement in front of a male coworker.

Mr. Graham has harassed me and a female coworker in regard to our activities following a commitment trip for a juvenile. Mr. Graham called us both lines and questioned where we were on our trip checking the odometer reading on the county <sup>11/20/96</sup> car. He also took 1 hour of overtime from both of us. This followed a full explanation by both of us regarding foggy conditions and an accident we avoided by taking an auxiliary route. Mr. Graham later screamed at me on two occasions that all juvenile commitment trips begin at 8:00 AM (a policy never established before nor enforced on any male PO's). I have observed numerous male PO's leaving for trips throughout the day. This is not an issue when either I or the other female PO take trips with male PO's.

Mr. Graham has screamed at me numerous times while I was seated at my desk in my individual office. He has physically moved toward me in an aggressive manner with his finger pointed in my face as he approaches. Mr. Graham has wadded a piece of paper from a file and threw it angrily at my desk in front of me. He has been angry to the point of moving personal pictures around on my desk with his face red and veins protruding in his neck.

Mr. Graham and Mr. Orentkauskis have stated they "Punish" people who don't comply with them or who have fallen out of favor with them. This can include adding cases disproportionately, making degrading comments, keeping private files on them and instructing <sup>11/20/96</sup> me not to talk to another female PO who previously brought a sexual

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harassment charges against Mr Ozenkarski. The charge at that time was Mr Ozenkarski (along with Mr Graham) has called females in the office the "Cunt Club".

4/2/97 I have been harassed and admonished by Mr Graham for taking issues to Mr Ozenkarski, the Chief when Mr Graham refused to discuss an issue and told me to get out of his office. I was following the chain of command in an effort to resolve the issue. Mr Ozenkarski's response was to state that Mr. Graham is in charge and he does not want involved. Mr Ozenkarski has washed his hands of all responsibilities as chief stating he has put his "Fucking 35 yrs in and Mr Graham is in charge".

12/12/96 Mr Graham has told me explicit stories regarding sexual problems with his wife. He has explained how she masturbates him at night, but refuses him sex. He stated he wakes up and finds the bed shaking and pulls her hand out of her panties and finds it all "wet". When I told him several times I did not want to hear about this and suggested couples counseling, he responded by accelerating his vehicle to over 95 mph screaming he has no problem. I have been told if I can't take any of the truth, I should go back to social work. Mr Graham has harassed me regarding office



~~procedures~~ Procedures followed by other male PO's are not acceptable when I follow the same procedure. This has been verified by a male PO who has commented "we can do it this way, but Mr Graham will not allow you to do it this way". I have also been harassed by Mr. Graham for revealing information regarding his and Mr. Ozonkarski's out of the office questionable activities using county equipment or representing themselves as PO's of authority to get products and services.

4/14/97 Mr. Graham has harassed me by stating loudly in the public office that I have no "Fucking sense, no fucking training, and no fucking ability". This could be heard by the entire office and public. This ranting continued for approximately 10 minutes.

3/95 Mr. Graham has left me know his sexual intentions covertly since my employment began. Mr. Graham patted my behind during training at the local prison. Mr. Graham has given me 1/18/96 an inappropriate birthday card. Mr. Graham has checked my personal calendar, found it when my husband was out at town and came to my home screaming my name from the back of my yard. I told him my husband was home

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2 If you were subjected to unwanted harassment, was your employment status in any way threatened if you did not go along with the harassment? For example, did the harasser tell you that you would be discharged, would receive a lower evaluation, would not receive a pay raise or promotion? If your answer is yes, provide specifics about what was told to you

Mr Graham stated that he would write me up take me to the Chief and Judge after I told him I was offended by his sexual and angry comments. I was told by Mr Graham that promotions are based on more than seniority (sexually interpreted) and that I need to satisfy (winking in my direction) the community the victim and interpreted to mean him Mr Graham and Mr Osenkowski arbitrarily moved me lower on our seniority list (against the judge's order) after the Probation dept split into Juvenile and Adult. Mr Graham said if I don't like it, make my case with the judge. I did - nothing changed. This affects promotions.

3. Did you inform the person doing the harassment that you objected to what was said or being done? If yes, what did you say? What was the response, if any?

I told Mr Graham I was offended by his comments of sexual favors for promotions which enraged him. He increased the angry yelling comments and said he would write me up take me to the Chief and Judge. When I told him I didn't want to hear specific sexual details of his personal life, recommended counseling he sped up to 95 mph screaming he has no problem. He also left me know that he destroyed items at home to punish his wife. (I took this as a warning). The two men have always bragged about punishment. The Sheriff of our county agrees that Mr Graham would retaliate against me if major charges were made against him such as firing.

4. Did you report the harassment to any employer official or representative? Yes ( ) no ( )  
If yes, indicate the following:

- a) Name of person Dan Hartnett  
b) Job title Personnel Director - Cumberland Co.

c) Which act or acts of harassment did you report?

Sexual, Yelling, Screaming, Swearing - all that  
enclosed in report

d) When did you report this harassment?

April 3, 1997

e) Did you report this harassment orally or in writing?

Both

f) If in writing, do you have a copy of the complaint?

Yes enclosed attached

g) What happened as a result of your complaint? *copy enclosed attached*

An internal investigation was undertaken until  
July 11, 1997. Recommendation was totally dismissed  
by judge because of past friendship with Mr. Graham  
and his wife (who is a court stenographer and previously stenograph  
for this judge) The judge told me the men have always  
been "asshole" buddies and Mr. Graham is acting like  
his "old man." No changes in the office. Mr. Graham  
got 3 days on the street of his choice (2 being a weekend)

5. Other than as described in #4 above, did you tell any co-workers about any act or acts of harassment? If yes, provide the following information

many witnessed the activities

a) Name/address/phone number of co-worker(s)

Debra Green 717-240-6270 Mark Galbraith 717-240-6264  
 Kerry Houser 717-240-6283 Greg Miller 717-240-6264  
 Bill Brandt 717-240-6266

b) Indicate which act or acts of harassment you mentioned and the date you mentioned the acts.

many witnessed the office incidents  
 Other sexual harassment was disclosed early fall 1996 - all incidents were eventually disclosed

c) When did you tell the person or persons?

Fall 1996

6. To the best of your knowledge, have any other current or former employees been subjected to similar harassment? If yes, provide the following for each such employee, adding extra pages if needed?

a) Name <sup>70</sup> Kerry Houser, <sup>70</sup> Debra Green, <sup>70</sup> Bill Brandt <sup>70</sup>

b) Job title

c) Address/phone number

Kerry - 717-240-6283  
 Debra - " 6270  
 Bill - " 6266

d) Description of harassment received

Sexual - Kerry - 1993 ongoing covertly where people are told not to talk to her - she is described by Mr Graham as being an angry divorced woman.

Unfair Treatment of Debra regarding office procedures usually in connection with me.

Bill Brandt - retaliation for testifying regarding Kerry Houser's complaint

e) Name and job title of each person doing the harassment

S Gareth Graham

Joseph Osen Karstki

f) Approximate date(s) of harassment

Kerry Houser - 1993 - present

Debra - 1996-1997

Bill Brandt - 1993 -

g) How are you aware that this other harassment occurred?

Directly being told by all parties & observation



7. Were there any other witnesses to harassment? If so, provide the name and job title of each such witness, along with his/her telephone number and address if you know them, and indicate which incident(s) the individual witnessed.

Jon Cron	717-240-	6265	in office
Darby Christle	" "	6273	" "
Sam Miller	" "	6279	" "
Ronra Boyles		7824	" "
Debra Green	" "	7270	" "

I declare under penalty of perjury that I have read the above statements and that they are true and correct.

Debra E. Vann  
Signature

7/21/97  
Date